

REMARKS

The present application was filed on September 29, 2003 with claims 1 through 33. Claims 1 through 33 are presently pending in the above-identified patent application.

In the Office Action, the Examiner rejected claims 1-7, 10 and 27-33 under 35 U.S.C. §103(a) as being unpatentable over Moy (United States Patent Number 5,425,102) and further in view of Watkins (United States Patent Number 5,719,560) and claims 8-26 under 35 U.S.C. §103(a) as being unpatentable over Moy in view of Watkins, and further in view of Serpa (United States Patent Number 6,954,862 B2)

Independent Claims 1, 17-19 and 27

Independent claims 1 and 27 were rejected under 35 U.S.C. §103(a) as being unpatentable over Moy in view of Watkins and claims 17-19 were rejected under 35 U.S.C. §103(a) as being unpatentable over Moy in view of Watkins, and further in view of Serpa. Regarding claim 1, for example, the Examiner asserts that Moy teaches a method for generating a password for a user. The Examiner acknowledges that Moy is silent on the capability of *automatically* generating a password.

The Examiner asserts, however, that Watkins teaches this limitation in col. 3, lines 49-59. In this passage, Watkins teaches:

Passwords are either automatically generated, or else each user secretly chooses his or her own password. Automatically generated passwords may be random numbers, or they may be randomly constructed nonsense words such as PEGWIZ or SUDBAT, which are marginally easier to remember.

Thus, Watkins is limited to automatically generating passwords *based on random numbers or nonsense words*. Independent claims 1 and 27 require automatically generating a password *based on said selected hint*. Independent claim 17 requires automatically generating a password *based on said selected poem*, said generated password having a similar rhyme and meter as said selected poem. Independent claim 18 requires automatically generating a password *based on said selected joke*, said generated password including said variations for said one or more variable words or phrases. Independent claim 19 requires automatically generating a password *based on said selected subset of said icons*.

By employing *random numbers or nonsense words*, Watkins **teaches away** from each aspect of the present invention. Thus, a person of ordinary skill in the art would not combine

Watkins with Moy to arrive at the present invention, in the manner suggested by the Examiner.

The Examiner asserts that a person of ordinary skill in the art would have been motivated to modify Moy with the teachings of Watkins to “enhance the level of security of methods of automatic verification of personal identity,” (citing the Abstract of Watkins). Watkins, however, *again teaches against* this combination in the remaining portion of the Abstract: “a person can more easily remember cue-response associations *than passwords* ” (emphasis added).

Finally, the Examiner asserts that a person of ordinary skill in the art would have been motivated to modify Moy with the teachings of Watkins to “make it more convenient for a user to use password protection for files and to encrypt files,” (citing col. 1, lines 7-9 of Moy). While the password hints of Moy may improve convenience, Watkins explicitly acknowledges that the passwords based on random numbers or nonsense words are difficult to remember (and thus less convenient, using the terminology of Moy). Again, based on this contradiction, a person of ordinary skill in the art would not combine Moy with Watkins.

Thus, Moy or Waterdoes not disclose or suggest *automatically generating a password* based on said selected hint, as required by independent claims 1 and 27, does not disclose or suggest *automatically generating a password* based on said selected poem, said generated password having a similar rhyme and meter as said selected poem, as required by independent claim 17, does not disclose or suggest *automatically generating a password* based on said selected joke, said generated password including said variations for said one or more variable words or phrases, as required by independent claim 18, and does not disclose or suggest *automatically generating a password* based on said selected subset of said icons, as required by independent claim 19.

Dependent Claims 2-16, 20-26 and 28-33

Dependent claims 2-7, 10 and 28-33 were rejected under 35 U.S.C. §102(b) as being anticipated by Moy in view of Watkins and claims 8-16 and 20-26 were rejected under 35 U.S.C. §103(a) as being unpatentable over Moy in view of Watkins, and further in view of Serpa.

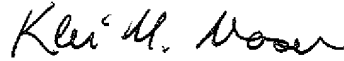
Claims 2-16, 20-26, and 28-33 are dependent on claims 1, 19, and 27, respectively, and are therefore patentably distinguished over Moy, Watkins and Serpa (alone or in any combination) because of their dependency from independent claims 1, 19, and 27 for the reasons set forth above, as well as other elements these claims add in combination to their base claim.

If any outstanding issues remain, or if the Examiner has any further suggestions for expediting allowance of this application, the Examiner is invited to contact the undersigned at the

telephone number indicated below.

The Examiner's attention to this matter is appreciated.

Respectfully submitted,



Date: July 31, 2007

Kevin M. Mason
Attorney for Applicant(s)
Reg. No. 36,597
Ryan, Mason & Lewis, LLP
1300 Post Road, Suite 205
Fairfield, CT 06824
(203) 255-6560